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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SHARRON FRYE,

Plaintiff,

vs.

CITY OF SACRAMENTO, a municipal
corporation; SACRAMENTO CHIEF OF
POLICE KATHERINE LESTER; former
SACRAMENTO CHIEF OF POLICE
DANIEL HAHN; Police Officer
GOETTING, individually and in his
capacity as an officer for the Sacramento
Police Department; and DOES 1 through 20,

Defendants.

Case No.: 2:22-cv-01936-DJC-CSK

**AMENDED STIPULATION TO
MODIFY SCHEDULING ORDER;
ORDER**

COMES NOW Plaintiff Sharron Frye and Defendants City of Sacramento, Katherine Lester, Daniel Hahn, and Derek Goetting, by and through their respective counsel and subject to the approval of this Court, hereby stipulate and respectfully request that this Court's Initial Scheduling Order (ECF No. 11), and its further Order modifying discovery deadlines (ECF No. 28), dated April 17, 2024, be modified to reflect new deadlines and cut-off dates as follows, or as to accommodate the Court's docket:

	<u>Current Date</u>	<u>New Date</u>
Expert Disclosure:	July 31, 2024	October 16, 2024
Rebuttal Expert Disclosure:	August 28, 2024	November 15, 2024
Expert Discovery Cut-Off:	September 27, 2024	December 16, 2024
Dispositive Motion Deadline:	November 7, 2024	February 19, 2025
Dispositive Motion Hearings:	January 7, 2024	April 17, 2025
Final Pretrial Conference:	April 22, 2025	July 17, 2025
Trial:	June 23, 2025	September 15, 2025

WHEREAS, the parties have recently engaged in productive settlement discussions and agree that allowing additional time and attention to engage in such discussions may obviate the need for experts and other judicial resources;

WHEREAS, counsel for all parties have met and conferred and agree that it would be in the interest of justice and judicial economy and that good cause exists for the modification of the scheduling orders of this Court;

WHEREAS, the proposed changes to dates above have been cleared with the Court's present calendar availability;

WHEREAS, this stipulation is not being made for the purpose of delay, or any other improper purpose;

WHEREAS, continuing the deadlines will not prejudice any party or their counsel;

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WHEREAS, this is the parties' second request to modify the scheduling order.

IT IS SO STIPULATED.

DATED: July 31, 2024

KATON LAW

By: /s/ GLENN KATON

GLENN KATON

Attorney for SHARRON FRYE

DATED: July 31, 2024

SUSANA ALCALA WOOD

City Attorney

By: /s/ KATE D.L. BROSSEAU

KATE D.L. BROSSEAU

Deputy City Attorney

Attorneys for the
CITY OF SACRAMENTO, KATHERINE
LESTER, DANIEL HAHN, and DEREK
GOETTING

ORDER

Having reviewed and considered the above stipulation, the scheduling order is modified to reflect the following deadlines:

New Date

Expert Disclosure:	October 16, 2024
Rebuttal Expert Disclosure:	November 15, 2024
Expert Discovery Cut-Off:	December 16, 2024
Dispositive Motion Deadline:	February 19, 2025
Dispositive Motion Hearing:	April 17, 2025, at 1:30 PM
Final Pretrial Conference:	July 17, 2025, at 1:30 PM
Trial:	September 15, 2025, at 8:30 AM

IT IS SO ORDERED.

Dated: July 31, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE